

EXHIBIT 10

ROUGH DRAFT OF 30(b)(6) DEPO OF PAUL VARGHESE

1 room.

2 Q. There's a look book in the control room
3 of the LUMMUS for the lock-out/tag-out system; is
4 that correct?

5 A. That is correct.

6 Q. All right. And is it your testimony
7 that that lock-out/tag-out system was not applicable
8 at the time this vessel was in Detyens Shipyard?

9 A. It was applicable in accordance with the
10 section -- Work Item 22 and it was applied. There
11 were two levels of isolation done.

12 Q. Okay. So was the lifeboat davit
13 actually tagged out on the LUMMUS on April 3, 2019
14 when my client was killed?

15 A. The tag out for the equipment. The
16 lifeboat equipment was tagged out.

17 Q. Okay.

18 A. Individual components -- individual
19 components are not tagged out separately. The
20 lifeboat system was tagged out in two locations.

21 Q. All right. And the two locations for
22 the tag out of lifeboat system, was that done by
23 Crowley personnel, that procedure?

24 A. Yes. That is requested and then done by
25 Crowley. Yes.